

**ORIGINAL**

SAMUEL T. POOLE

CIVIL ACTION NO. 99-635

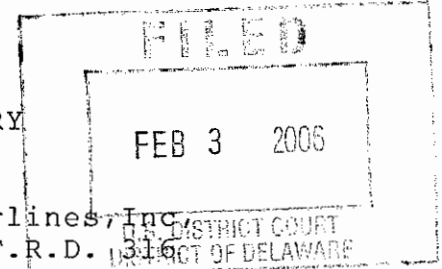
V.

STAN TAYLOR  
RAPHEL WILLIAMS  
JANE BRADY

SUE L. ROBINSON

FAILURE TO COMPLY WITH INTERROGATORIES AND DISCOVERY

! INTERROGATORIES See/E.G., McEiroy V, united airlines, Inc. 21 F.R.D. 100 (W.D.MO.1967), Presley V. Boehike, 33 F.R.D. 316, 317, (W.D.N.(1963). although in exceptional circumstance reliance on an answer may cause such prejudice that the court will hold the answering party bound to his answer, E.G., Zielinski V. Philadelphia Piers, Inc., 39 F.SUPP.408 (ED.PA.1956) answer to the interrogatories correctly and committed fraud on the Question that was answer with perjury and this can be found out with a civil investigation.



CIVIL INVESTIGATION, F.R.CRIME.P. TITLE 18, 1968 or in RE. Harrison, D.C.APP, 461 A2d. 1034, 1036 to where the defendants requested for more inmates than what was being housed at the prison which is not only a crime but perjury by the defendants. Statement that they did not put anybody on the floor and they were not aware of anybody on the floor but they ask for Fed. and State money to house the inmate on the floor because they would need to show for every inmates. Estoppel Gov. act in misleading ways in answer the interrogatories. U.S. V. Pennsylvania Ind. Chemical Corp., 411 U.S. 655, 670, 93 S. CT. 1804, 1814, 1887, 36 LEd, 2d 567, 1973 and for Equitable Estoppel U.S. V. Thomas, 357 F3D 357 and see U.S. V. Denkins, 367 F3D 357, 2004 Fed APP. 129 P U.S. 357 F3D 204 and see Falcone V. pierce, 864 F2D 266 (1st cir. 1988)

F.R.CIV.P. rule 37 (G) (C) (1)(a) the defendants has failure to bring about discovery and properly answer the interrogatories 37 (C) may apply Betha BLDG. CORP. V. National theatres CORP. 15 F.R.D. 339 (E.D.N.Y.1954) and see U.S. Heng Hsin Co. V. Stern, Morenthau and Co., 20 Fed rules serv. 36 A.52. Case 1 (S.D.N.Y. Dec. 10 1954) and see U.S. Plywood Corp. V. Hudson lumber Co., 127 F. SUPP. 489, 497-498 (S.D.N.Y.1954) containing to the defendants evading the discovery E.G. Mikewski V. Schneider Transportation Co. 238 F2D 397 (6th cir 1956);

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Dictograph products Inc. V. Kentworth Corp., 7 F.R.D. 543 (W.D.Ky .1947)., and see Brown V. U.S.1928, 48.Ct.288,276.U.S.134,143 72.led.500 Subpoena Specifics and see consolidated Rendering Co. V. Vermont, 1908 28 S. ct. 178, 207, U.S.541,543-544,522,led. 327.E.G. United Sheeplined Clothing Co. V. Artic Fur Cap.Corp. ., 165 F Supp. 193 (S.D.N.Y.)1958);AustinTheatre Inc. V. Warner Bros.Pictures Inc.22. F.R.D.302.(S.D.N.Y.1958); to where a default judgement for refusal to answer Hammond Packing Co. V. Arkansas 1909, 29.S.ct.370.212.U.S.322,53.led.530,15 Ann. Cas.645. and see Houey V. Elliott,1897,17 S.ct.841,167,U.S.409. 42.led.215. for the mere purpose of punishing for contemp Sub- divison(A)(3) E.G.cone mills Corp. V. Josegh bancroft and son CO. 33.F.R.D.318.C.D.Del.1963);Societe Internationale V.Rogars,35 7, U.S.197 (1958). Both Petitions was respectfully Submitted to your court to where Sactions could be impose on the defendants for evadeing both petitions and committing fraud an the interr- ogatories

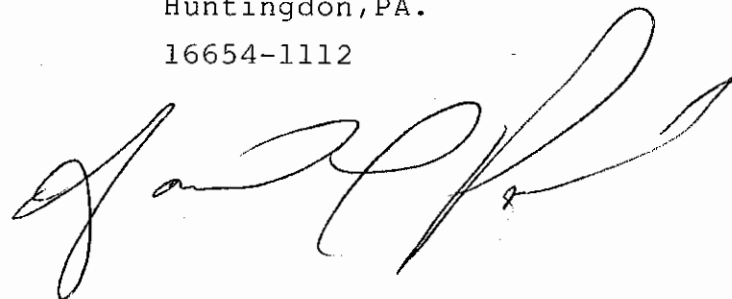
Relief-Order the SANCIOMS WITH IN THIS PETITION TO THE DEFENDANTS AND THE INVESTAGATION OF THE FRAUD HOLDING THEM LIABLE FOR ALL DAMAGES BYORDER OF THE COURT FOR FAILURE TO COMPLY.

THANK YOU

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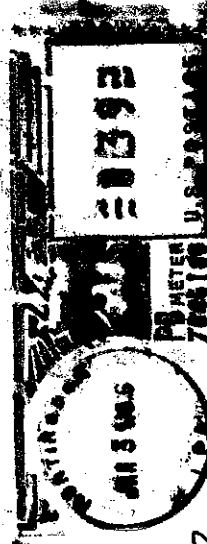
1-25-06

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